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February 29, 2008

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

RE: CHEAP2DIAL TELEPHONE, LLC
Customer Proprietary Network Information Certification
EB Docket No. 06-36

Dear Ms. Dortch:

Pursuant to 47 C.F.R. 64.2009(e) please find attached the 2007 Annual CPNI Certification and Accompanying Statement filed on behalf of CHEAP2DIAL TELEPHONE, LLC. These documents are submitted in accordance with the directive set forth in the FCC's *Public Notice*, DA 08-171, EB Docket No. 06-36, released January 29, 2008.

Please contact the undersigned should you have any questions or concerns at (269) 381-8844 or pcrocker@earlylennon.com.

Very truly yours,

EARLY, LENNON, CROCKER & BARTOSIEWICZ, P.L.C.

Patrick D. Crocker

PDC/tld

cc: FCC Enforcement Bureau (2 copies via USPS Mail)
Best Copy and Print, Inc. (via e-mail FCC@BCPIWEB.COM)

Customer Proprietary Network Information Annual Certification of Compliance
Pursuant to 47 C.F.R. § 64.2009(e)

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for year 2007.

Date filed: February 29, 2008

Company covered by this Certification: Cheap2Dial Telephone, LLC

Form 499 Filer ID: 826953

Name of Signatory: Barry Ryneerson

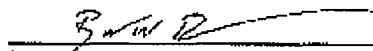
Title of signatory: Managing Member

I am the Managing Member of Cheap2Dial Telephone, LLC and as such do hereby certify, affirm, depose, and say that I have authority to make this Customer Proprietary Network Information ("CPNI") Annual Certification of Compliance on behalf of Cheap2Dial Telephone, LLC. I have personal knowledge that Cheap2Dial Telephone, LLC has established adequate operating procedures to ensure compliance with the Commission's CPNI rules as set forth in 47 C.F.R. § 64.2001 et. seq.

Attached to this Certification is an Accompanying Statement explaining how Cheap2Dial Telephone, LLC procedures ensure compliance with the requirements set forth in 47 C.F.R. § 64.2001 et seq.

Cheap2Dial Telephone, LLC received no customer complaints in the past year concerning the unauthorized release of CPNI. Further, Cheap2Dial Telephone, LLC has taken no action against data brokers for the unauthorized release of CPNI during calendar year 2007. Cheap2Dial Telephone, LLC will report any information it may obtain with respect to the processes pretexters are using to attempt to access CPNI and what steps the Company is taking to protect CPNI.

This certification is dated this 28th day of February, 2008.



Barry Ryneerson
Managing Member
Cheap2Dial Telephone, LLC

Accompanying Statement to Annual CPNI Compliance Certification for

CHEAP2DIAL TELEPHONE, LLC

CHEAP2DIAL TELEPHONE, LLC (CHEAP2DIAL) operating procedures ensure that CHEAP2DIAL is in compliance with 47 C.F.R. Part 64, Subpart U, as follows:

Employee Training and Discipline

- CHEAP2DIAL requires all employees as well as, contractors and agents (if applicable) with access to CPNI to sign a Statement of CPNI Acknowledgement, stating that they are to protect the confidentiality of the CPNI and that they are prohibited to use the CPNI information for any purpose other than addressing customer inquiries or for other internal matters that are NOT related to marketing efforts. Failure to follow the Statement may result in disciplinary action or termination of their employment.

Sales and Marketing Campaigns

- CHEAP2DIAL requires management approval for any and all sales and marketing campaigns to ensure that CPNI is not used.
- CHEAP2DIAL does not sell or license CPNI from its product service offerings for third party marketing campaigns.
- CHEAP2DIAL ensures that agreements entered into with third party service providers that store CPNI include verbiage that acknowledges such CPNI is CHEAP2DIAL's proprietary information and that the service provider is prohibited to use such information for solicitation or for any other purpose outside the terms of the agreement.

Record-Keeping Requirements

- CHEAP2DIAL does not store CPNI records in its internally maintained databases.
- CHEAP2DIAL requires that CPNI records maintained by third party service providers are being maintained for a minimum of one (1) year.

Establishment of a Supervisory Review Process

- CHEAP2DIAL establishes a supervisory review process for all outbound marketing situations to ensure no CPNI records are being utilized.

Opt-In

- CHEAP2DIAL does not market CPNI. However, if CHEAP2DIAL was to market CPNI it would only disclose CPNI to sales agents, affiliates, joint venture partners, independent contractors or to any other third parties after receiving "opt-in" approval from a customer.
- CHEAP2DIAL enters into confidentiality agreements with joint venture partners, independent contractors or any other third party when releasing or storing CPNI. All such confidentiality agreements are reviewed by management for compliance with this Policy.

Opt-Out Mechanism Failure

- CHEAP2DIAL will not market CPNI. However, if CHEAP2DIAL was to market CPNI it would establish a protocol requiring written notice to the FCC within five (5) business days of any instance where opt-out mechanisms did not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

Compliance Certificates

- CHEAP2DIAL executes a statement, signed by an officer, certifying that he or she has personal knowledge that CHEAP2DIAL has established operating procedures that are adequate to ensure compliance with the FCC's CPNI regulations.
- CHEAP2DIAL prepares an Accompanying Statement detailing how operating procedures ensure compliance with CPNI regulations.
- CHEAP2DIAL provides, if applicable, an explanation of any actions taken against data brokers.
- CHEAP2DIAL provides, if applicable, a summary of all customer complaints received in the past year concerning unauthorized release of CPNI.

Customer Notification of CPNI Changes

- CHEAP2DIAL only make changes to CPNI upon a customer's request.
- Customers do not have access to CPNI information on-line. However, customers may access and modify their CPNI information by contacting our customer service center.

Notification to Law Enforcement and Customers of Unauthorized Access

- CHEAP2DIAL notifies the appropriate law enforcement agency of any unauthorized access to a customer's CPNI.
- CHEAP2DIAL ensures that all records of any discovered CPNI breaches are kept for a minimum of two (2) years.